

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

| | | |
|---------------------------------------|---|------------------|
| In re: |) | |
| |) | Bankruptcy Case |
| Eagle Properties and Investments, LLC |) | No. 23-10566-KHK |
| |) | Chapter 7 |
| |) | |
| Debtor, |) | |
| _____ |) | |
| |) | |
| Gitsit Solutions, LLC, |) | |
| |) | |
| Movant, |) | |
| |) | |
| v. |) | |
| |) | |
| Eagle Properties and Investments, LLC |) | |
| |) | |
| Debtor, |) | |
| |) | |
| and |) | |
| |) | |
| H. Jason Gold, Chapter 7 Trustee |) | |
| |) | |
| Respondent. |) | |

**TRUSTEE’S RESPONSE AND OPPOSITION TO MOTION FOR RELIEF FROM
AUTOMATIC STAY**

COMES NOW, H. Jason Gold, the Chapter 7 Trustee (“Trustee”), by counsel, and files this response and opposition to the Motion for Relief from Automatic Stay (the “Motion”), stating to the Court as follows:

1. As reflected on Schedule A, the Debtor owns real property commonly identified as 7213 Linglestown Road, Harrisburg, PA 17112 (the “Property”).

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Counsel to the Chapter 7 Trustee

2. The Trustee has investigated of the value of the Property and the liens asserted against the Property. The Trustee is currently marketing the Property and desires additional time in order to present an acceptable contract to movant.

3. Accordingly, the Trustee opposes the relief from the automatic stay sought in the Motion and requests that he be given a reasonable period of time to market the property for sale.

4. The Trustee lacks sufficient information to form a response to the allegations in the Motion that cause exists to grant the relief sought in the Motion and therefore denies the same and demands strict proof.

WHEREFORE, having responded to the Motion, the Trustee prays (i) that the Court continue the hearing on the Motion until such time as the Trustee has had a reasonable period of time to market the Property for sale; and (ii) for such other and further relief as may be necessary.

Respectfully submitted,

H. JASON GOLD, TRUSTEE

By Counsel

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By: /s/ Dylan G. Trache
Dylan G. Trache, Va. Bar No. 45939

Counsel to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of May, 2024 the foregoing Trustee's Response and Opposition to Motion for Relief From Automatic Stay was served via CM/ECF to the parties registered to receive such notices, or by first class mail, postage prepaid, including:

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